

LAW OFFICES OF

SLIVKA ROBINSON WATERS & O'DORISIO

A Professional Corporation

RICHARD P. SLIVKA

May 23, 2000

FEDERAL EXPRESS

U.S. Federal Election Commission
Office of General Counsel
999 E. Street NW
Washington, DC 20463

Re: **MUR 5003**

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
MAY 24 10 24 AM '00

Dear Office of General Counsel:

This letter is Respondent's answer to MUR 5003, concerning the event for presidential candidate George W. Bush held in the parking lot of the Denver Broncos's Dove Valley headquarters. This is the second complaint lodged against the Denver Broncos as a result of this event. The Broncos timely responded to the first complaint, numbered MUR 4986, on April 12, 2000. The Denver Broncos reiterate that it did not involve itself in this election process, and has engaged in no conduct violating any state or federal election laws. For the reasons set forth below, the Commission should dismiss this complaint.

On March 10, 1999, a rally was held for presidential electoral candidate George W. Bush. The local newspapers' portrayal of the event was wholly inaccurate. The Denver Broncos had no involvement in the organization of this event; it was entirely organized, overseen and executed by George W. Bush's campaign committee, "Bush For President." The Denver Broncos allowed the Bush campaign to use the parking lot adjacent to Dove Valley because of apparent problems encountered in holding this event at another facility in Arapahoe County. At no time did the Denver Broncos make any effort to ensure the success or failure of the event.

During the course of the event, George W. Bush was presented with a customized Denver Broncos football jersey. Jerseys are regularly presented to celebrities and public figures as gestures of good will, such as to President Clinton during a post-Super Bowl visit to the White House. They carry no message of promotion of the people to whom they are presented.

During the event there was no direct use of any facility at the Denver Broncos's Dove Valley headquarters itself. The entire event took place in the parking lot adjacent to Dove Valley. After the event had ended, the Denver Broncos allowed the press to utilize a room inside Dove Valley for the sole purpose of a press conference.

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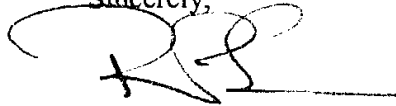
Furthermore, it is neither the policy nor practice of the Denver Broncos to charge any fee for the use of its parking lot for public events. Consistent with that position, the Denver Broncos did not charge George W. Bush or any other person in attendance at the event for the use of the parking lot.

The Denver Broncos did not contribute or donate anything of value to the Bush campaign for president, and has been or is being fully compensated for all costs incurred in relation to the event.

In light of the foregoing, there is no basis for any claim that the Denver Broncos nor any of its officers or representatives have violated any federal election laws. The Federal Election Commission should not allow this matter to proceed further.

Finally, for the convenience of the Commission, and in the interest of efficiency, any further complaints stemming from this event should be consolidated with the responses to MUR 4986 and MUR 5003.

Sincerely,

A handwritten signature in black ink, appearing to be 'R. Slivka', with a horizontal line extending to the right.

Richard P. Slivka
Counsel for the Denver Broncos